

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Kraton Polymers U.S. LLC
2419 Sate Route 618
Belpre, Ohio 45714

ATTENTION:

Danielle D. Axsom
Environmental Engineer

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Kraton Polymers U.S. LLC (Kraton or you) to submit certain information about the facility at 2419 Sate Route 618, Belpre, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Kraton owns and operates an emission source at the Belpre, Ohio facility. We are requesting this information to determine whether your emission source is complying with your Title V permit.

Kraton must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch

U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Kraton must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

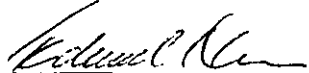
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Kraton to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Gregory Gehrig at (312) 886-4434.

Date

3/15/19



Edward Nam
Director
Air and Radiation Division

[This page intentionally left blank]

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 et seq.,

1. “*Document(s)*” means any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such *document* shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All *documents* in hard copy should also include attachments to or enclosures with any *documents*.
2. *Flare* means a combustion device lacking an enclosed combustion chamber that uses an uncontrolled volume of ambient air to burn gases. For the purposes of this rule, the definition of *flare* includes, but is not necessarily limited to, air-assisted flares, steam-assisted flares and non-assisted flares.
3. *Pilot gas* means gas introduced into a flare tip that provides a flame to ignite the flare vent gas.
4. *Flare purge gas* means gas introduced between a flare header's water seal and the flare tip to prevent oxygen infiltration (backflow) into the flare tip or for other safety reasons. For a flare with no water seal, the function of *flare purge gas* is performed by flare sweep gas and, therefore, by definition, such a flare has no *flare purge gas*.

5. "Relate to" or "pertain to" (or any form thereof) means constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
6. *Flare supplemental gas* means all gas introduced to the flare to improve the heat content of combustion zone gas. *Flare supplemental gas* does not include assist air or assist steam.
7. *Flare sweep gas* means, for a flare with a flare gas recovery system, the gas intentionally introduced into the flare header system to maintain a constant flow of gas through the flare header in order to prevent oxygen buildup in the flare header; *flare sweep gas* in these flares is introduced prior to and recovered by the flare gas recovery system. For a flare without a flare gas recovery system, *flare sweep gas* means the gas intentionally introduced into the flare header system to maintain a constant flow of gas through the flare header and out the flare tip in order to prevent oxygen buildup in the flare header and to prevent oxygen infiltration (backflow) into the flare tip.
8. *Flare vent gas* means all gas found just prior to the flare tip. This gas includes all flare waste gas, that portion of flare sweep gas that is not recovered, flare purge gas and flare supplemental gas, but does not include pilot gas, total steam or assist air.
9. *Waste gas* means gas from facility operations that is directed to a flare for the purpose of disposing of that gas.

Appendix B

Information You Are Required to Submit to EPA

Kraton Polymers U.S. LLC (Kraton) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 30 days of receipt of this request. Unless otherwise stated, the information is to be provided from January 1, 2016 until the date you received this request. All items below seek information regarding all devices meeting the definition of flare at the Kraton facility located at 2419 State Road 618 in Belpre, Ohio (Facility). For all requested items, you do not need to provide information previously provided to EPA during or shortly after EPA's September 2018 Inspection. Please provide:

1. A list of each flare at the Facility. For each flare, provide the following:
 - a. Flare manufacturer and model;
 - b. Flare diameter;
 - c. Flare installation date;
 - d. Whether the flare is unassisted, steam-assisted, or air-assisted;
 - e. Design destruction efficiency for volatile organic compounds;
 - f. Flare design and operation specifications (typically from the manufacturer);
 - g. The minimum and maximum steam or air addition rates, in pounds per hour (lb/hr) for steam and/or standard cubic feet per hour (scf/hr) for air, at all locations on the flare (seal, upper, center, and lower). To the extent that the steam or air addition rates change on a seasonal basis, state the rates for each season and the time periods during which each season's rates apply.
 - h. All written operation and maintenance procedures, including a Startup, Shutdown, and Malfunction Plan, if available. Include all documents in your possession, custody, or control that pertain to or contain information regarding flare design, maintenance or operation. Include all previous versions of these documents.
 - i. Your procedures for controlling steam or air added to the flare(s), including procedures used during process equipment upsets; and/or when the flare is smoking, night operations and other periods of low visibility. Indicate how long each procedure has been in place and, if applicable, provide any previous procedure(s). You do not need to include these procedures here if included in 1.h above.
2. A description of gases that are vented to the flare(s). Identify the processes involved. Include approximate frequency (continuous, intermittent, emergency,

unit leaks, etc.) and a block flow diagram.

3. A description of your efforts to minimize all gas streams routed to the flare(s). In particular, describe your efforts to recover gases from process units or at the flare header that would otherwise be routed to the flare as waste gas.
4. Copies of all testing reports or analytical results generated after January 1, 2009, which relate to the waste gas and/or flare vent gas routed to each flare.
5. A list of the periods of time (date, start time, and end time) that flare vent gas was routed to each flare the Facility (i.e., "venting periods"). For each venting period, provide the following for each Facility flare:
 - a. Average heating value, in BTU/scf, of the flare vent gas.
 - b. Average mass flow rate of the flare vent gas, in lb/hr.
 - c. Average rate at which steam and/or air was being added to each Facility flare, in lb/hr for steam and/or scf/hr for air, at all locations on the flare (i.e., the sum of seal, upper, lower, center, winterizing, etc.).
 - d. Average steam-to-flare vent gas or air-to-flare vent gas ratio (lb steam/lb flare vent gas or scf of air/lb of flare vent gas).
 - e. Flare vent gas constituents and concentration. This may be included with 2 above if not continuously measured.

The averaging time shall not be greater than one hour (i.e. at a minimum, provide 1-hour averages for the items above). If any item a through e above are not measured (or not continuously measured), you shall use the best means available to estimate it. Provide a narrative explanation and example calculations describing how you arrived at your response for items not measured. Provide any numeric data and related calculations in Microsoft Excel.

6. For each Facility flare, state whether the flare is configured to receive gases/vapors from one or more pressure relief device(s), which is a safety device used to prevent operating pressures from exceeding the maximum allowable working pressure of the process equipment.
7. For each Facility flare, state specifically which, if any, federal and/or state regulations apply to each flare. Indicate whether the flare and its associated closed vent system is used as the method of compliance with any federal regulation, including without limitation, the Standards of Performance for New Stationary Sources found at 40 C.F.R. Part 60, the National Emission Standards for Hazardous Air Pollutants found at 40 C.F.R. Part 61, and the National Emission Standards for Hazardous Air Pollutants for Source Categories found at 40 C.F.R. Part 63, (specifically including without limitation any leak detection and repair (LDAR) provisions promulgated under these Parts such as 40 C.F.R. § 60.482-4(c) or 40 C.F.R. § 63.165(c)). In each such case, identify the process unit or equipment that is/are the "affected facility" under the applicable Part and the specific Subpart that applies to the "affected facility."

8. A summary of any action taken to address the findings of EPA's September 21, 2018 Inspection,
9. A process flow diagram of the Facility's production process with a narrative description. Include the wastewater treatment plant and all emission points.
10. A Facility diagram showing all emission units (EU) and pollution control equipment.
11. The potential to emit (PTE) for the Facility by pollutant and EU. Also provide actual emissions monthly per EU. Provide assumptions and the basis for emissions, e.g. emission factors (EFs) and their source. Provide this information in Microsoft Excel.
12. A description of the monitoring, including parametric monitoring, for finishing end pollution control equipment (PCE), which includes for Process Line G-1, a regenerative thermal oxidizer; K-1, a catalytic oxidizer; G-2, a catalytic oxidizer; and K-3, a vapor combustor. Include in the description the flow rate, temperature, pressure, and other monitored parameters. Provide your response in Microsoft Excel for each appropriate time-period.
13. All performance tests conducted since January 1, 2009 used to determine emissions of criteria pollutants or hazardous air pollutants for any PCE associated with the processes mentioned in 12 above.
14. Quarterly deviation reports required by active permits issued to the Facility by the Ohio Environmental Protection Agency, Department of Air Pollution Control (Ohio EPA). Also provide any malfunction, deviation and/or corrective action reporting provided to Ohio EPA that was not included in a quarterly deviation report, but instead was a requirement of permit condition and/or Ohio Administrative Code 3745-15-06.
15. For National Emissions Standards for Hazardous Air Pollutants Subpart H for Equipment Leaks:
 - a. Records per 40 CFR 63.181.
 - b. Notification of compliance status per 40 CFR 63.182(c).
 - c. Periodic reports per 40 CFR 63.182(d).
16. For National Emissions Standards for Hazardous Air Pollutants Subpart FFFF for Miscellaneous Organic Chemical Manufacturing, the records per 40 CFR 63.2525.
17. The VOC Leak Detection and Repair Program (LDRP) as outlined in the plan submitted to the Ohio EPA Southeast District Office on May 25, 2004 (or the most recent version) for components in cyclohexane service.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at *Section 114(c)* of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Danielle D. Axsom
Environmental Engineer
Kraton Polymers U.S. LLC
2419 Sate Route 618
Belpre, Ohio 45714

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

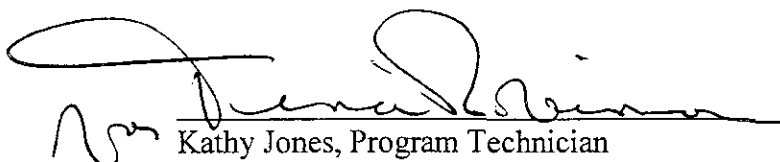
Clean Air Act by E-mail to:

Bob Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
bob.hodanbosi@epa.ohio.gov

James Kavalec, Environmental Manager
Division of Air Pollution Control
Ohio Environmental Protection Agency
james.kavalec@epa.ohio.gov

Jessica Kuenzli
Division of Air Pollution Control
Ohio Environmental Protection Agency
Southeast District Office
jessica.kuenzli@epa.ohio.gov

On the 18th day of March 2019.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7017066000036619257